

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***COMMENTS RECEIVED AND RESPONSE***

ON THE TITLE V DRAFT PERMIT V-03-021 R1

DANA CORPORATION-NORTH AMERICAN

SEALING PRODUCTS DIVISION

DANVILLE, KY

October 13, 2005

Mark Labhart, Reviewer

SOURCE I.D. #: 021-021-00049

SOURCE A.I. #: 384

ACTIVITY #: APE20050001

**SOURCE DESCRIPTION:**

The DANA Corporation-North American Sealing Products Division in Danville KY manufactures automotive steel gaskets. Their Title V permit was issued June 27, 2003. On April 7, 2005 the Division received an application for the addition of a new gasket coating line, similar to two Multi-Layer Steel (MLS) gasket production lines already permitted at this facility. The new line will consist of a series of coating applicators and drying ovens. Emissions from the new facilities will be vented to an existing Compact Valveless Regenerative Thermal Oxidation (VRTO) System. Also the Electric Batch Oven, originally permitted as EP03 (EU-22) has been removed from the facility so this equipment has been deleted from the permit. The net increase PTE is approximately 59.1 tpy for VOC and 0.33 tpy for HAPs.

**PUBLIC, AFFECTED STATE, AND U.S. EPA REVIEW:**

On August 16, 2005 the public notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in *The Advocate-Messenger* in Danville, Kentucky. The public comment period expired 30 days from the date of publication.

Comments were received from Shield Environmental Associates on behalf of DANA Corporation on September 6, 2005. Minor changes were made to the permit as a result of the comments received, however, in no case were any emissions standards, monitoring, recordkeeping or reporting requirements relaxed. Comments received, the Division's response to each, and a description of the changes made follows.

The permit is now being issued as proposed. The U.S. EPA has 45 days to comment on this proposed permit. No States were affected by this action.

## ***COMMENTS RECEIVED AND RESPONSE (CONT.)***

Comments on DANA Corporation's Draft Title V Air Quality Permit submitted by Nicole Galavotti, Project Engineer, Shield Environmental Associates, Inc.

1. DANA has changed its name and should be reflected as "DANA Corporation-North American Sealing Products Division"

*Division's response: Comment acknowledged, changes made, (permit, statement of basis, application summary, cover sheets).*

2. On page 3 of 20 the MLS Line 3 ovens (Primer Oven, 14-Micron Oven, 30-Micron Oven and Antistick Oven) were purchased from Ajax Tocco Magnethermic, not Feco as was originally conveyed. There is no change to the BTU rating on the ovens.

*Division's response: Comment acknowledged, change made (permit, p.3).*

3. On page 8 of 20 the Aqueous Wash Vent for MLS Line 3 should reflect a maximum line speed of 40 ft/min.

*Division's response: Comment acknowledged, change made (permit, p.8).*

4. In the Permit Application Summary Form, the Existing Equipment totals and the Sourcewide totals with New Construction do not match the totals calculated by the facility.

*Division's response: PTE of the new equipment as calculated by the Division is essentially the same number as was proposed in the application. The difference is due to the calculation of potential of the existing equipment. The Division used the same PTE as proposed in the original Title V application. The difference in the new plant wide PTE, approximately 6%, is due to a difference in how the facility has calculated the potential emissions from the existing equipment. No changes made.*

### **CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.